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March 19, 2024

Via E-Filing Only

Honorable Elizabeth A. Pascal
United States Magistrate Judge for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Copper Streets, Courtroom 5C
Camden, NJ 08101

**Re: Spiegel, et. al. v. Goldin Auctions, LLC, et. al.
Civil Action No.: 1:23-cv-1202-KMW
Joint Letter Requesting Continuance of Settlement Conference**

Dear Judge Pascal,

As discussed during our March 4 status conference, we write concerning the settlement conference scheduled for March 26 under the current scheduling order. *See* ECF No. 23 at 3. We have shared the letter with counsel for Goldin Auctions, LLC and Kenneth Goldin (collectively, "Goldin"), and they agreed to our filing this as a joint letter.

Consistent with counsel's report at the status conference, Goldin has started producing documents, and they intend to produce additional documents over the coming weeks. At this stage, however, the parties agree that it would be more productive to postpone next week's settlement conference until more discovery has been exchanged and the case record has been more fully developed. In particular, subject of course to Your Honor's availability, the parties submit that rescheduling the settlement conference for a date in June or July is likely to be more productive, and we respectfully ask the Court to reschedule the settlement conference within that timeframe.

Thank you in advance for the Court's assistance and consideration of this mutual request.

Respectfully,

/s/ William W. Cheney

William W. Cheney, III

WWC/mlb

cc: All counsel of record (via ECF)

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